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Coughlin

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

RONALD KOONS; NICHOLAS
GAUDIO; EFFREY M. MULLER;
SECOND AMENDMENT
FOUNDATION; FIREARMS POLICY
COALITION, INC.; COALITION OF
NEW JERSEY FIREARM OWNERS; and
NEW JERSEY SECOND AMENDMENT
SOCIETY,

Plaintiffs,

v.

WILLIAM REYNOLDS in his official
capacity as the Prosecutor of Atlantic
County, New Jersey; GRACE C.
MACAULAY in her official capacity as the
Prosecutor of Camden County, New
Jersey; ANNEMARIE TAGGART in her
official capacity as the Prosecutor of
Sussex County, New Jersey; MATTHEW
J. PLATKIN, in his official capacity as
Attorney General of the State of

Civil Action No: 1:22-cv-7464
RMB/EAP (CONSOLIDATED)

Hon. Renee Marie Bumb, U.S.D.J.
Hon. Elizabeth A. Pascal, U.S.M.J.

NOTICE OF MOTION
ON SHORT NOTICE TO INTERVENE
PURSUANT TO FED. R. CIV. P. 24(b)
BY INTERVENORS-APPLICANTS
SENATE PRESIDENT NICHOLAS P.
SCUTARI AND ASSEMBLY
SPEAKER CRAIG J. COUGHLIN

**New Jersey; and PATRICK CALLAHAN,
in his official capacity as Superintendent of
the New Jersey State Police,**

Defendants.

and

**NICHOLAS P. SCUTARI, President of the
New Jersey Senate, and CRAIG J.
COUGHLIN, Speaker of the New Jersey
General Assembly,**

Intervenors-Applicants

TO: Daniel L. Schmutter, Esq.
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PLEASE TAKE NOTICE that on February 21, 2023 or on such Short Notice as the Court may allow, Intervenors-Applicants, Nicholas P. Scutari, New Jersey Senate President, and Craig J. Coughlin, Speaker of the New Jersey General Assembly, by and through their counsel Cullen and Dykman LLP, and Kologi ♦ Simitz, shall move before the Hon. Renee Marie Bumb, U.S.D.J., at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building and U.S. Courthouse, 4th & Cooper Street, Camden, New Jersey, for an Order granting

Intervenors-Applicants' Motion to Intervene pursuant to Fed. R. Civ. P. 24(b).

PLEASE TAKE FURTHER NOTICE that in support of this Motion Intervenors-Applicants will rely on the accompanying Affirmation of Edward J. Kologi, Esq. (including proposed Answer of Intervenors-Applicants) and Brief.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested on the return date only if the within Motion is opposed.

A proposed form of order is submitted herewith.

Respectfully submitted,

Cullen and Dykman, LLP

By: /s/ Leon J. Sokol
Leon J. Sokol

Kologi ♦ Simitz, Counsellors at Law

By: /s/ Edward J. Kologi
Edward J. Kologi

Attorneys for Applicants-Intervenors
Senate President Nicholas P. Scutari and
Assembly Speaker Craig J. Coughlin

Dated: January 24, 2023